

EXHIBIT 2

**United States District Court
for the Southern District of New York**

Reynolds et al.,

Plaintiffs,

v.

Marymount Manhattan College,

Defendant.

Case No. 1:22-cv-06846-LGS

**DECLARATION OF
SCOTT M. FENWICK OF KROLL
SETTLEMENT ADMINISTRATION
LLC IN CONNECTION WITH
PRELIMINARY APPROVAL OF
SETTLEMENT**

I, Scott M. Fenwick, hereby declare:

1. I am a Senior Director of Kroll Settlement Administration LLC (“Kroll”),¹ the Settlement Administrator to be appointed in the above-captioned case, whose principal office is located at 2000 Market Street, Suite 2700, Philadelphia, Pennsylvania 19103. I am over 21 years of age and am authorized to make this declaration on behalf of Kroll and myself. The following statements are based on my personal knowledge and information provided by other experienced Kroll employees working under my general supervision. This declaration is being filed in connection with Preliminary Approval.

2. Kroll has extensive experience in class action matters, having provided services in class action settlements involving antitrust, securities, labor and employment, consumer and government enforcement matters. Kroll has provided class action services in over 3,000 settlements varying in size and complexity over the past 50 years.

3. Kroll is prepared to provide a full complement of notification services in connection with that certain Settlement Agreement and Release (the “Settlement Agreement”) entered into in connection with the above-captioned matter (the “Settlement”), including notice of the Settlement

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Settlement Agreement (as defined below).

Agreement disseminated by mail, and through the use of a Settlement Website to be created in connection with this matter.

4. It is Kroll's understanding that within fourteen (14) days of entry of the Preliminary Approval Order it will be provided with a list of Settlement Class Members covered under the proposed Settlement Agreement, and that such Settlement Class List is to contain a combination of names, current or last known addresses, and other data elements pertinent to the administration of the Settlement.

Notice by Mail

5. Kroll will work with Counsel to format the Short Form Notice for mailing. Upon approval, Kroll will coordinate the preparation of proofs of the Short Form Notice (which shall be mailed) and Long Form Notice (which shall be posted on the Settlement Website) for Counsel to review and approve.

6. As required under section IX. 75. of the Settlement Agreement, Kroll will send the Short Form Notice by First-Class Mail to the physical addresses of Settlement Class Members. In preparation for the Short Form Notice mailing, Kroll will send the Settlement Class Member data through the United States Postal Service's ("USPS") National Change of Address ("NCOA") database. The NCOA process will provide updated addresses for Settlement Class Members who have submitted a change of address with the USPS in the last 48 months, and the process will also standardize the addresses for mailing. Kroll will then prepare a mail file of Settlement Class Members that are to receive the notice via First Class Mail.

7. Mailed Short Form Notices returned by the USPS with a forwarding address will be automatically re-mailed to the updated address provided by the USPS.

8. Mailed Short Form Notices returned by the USPS undeliverable as addressed without a forwarding address will be sent through an advanced address search process in an effort to find a more current address for the record. If an updated address is obtained through the advanced search process, Kroll will re-mail the Short Form Notice to the updated address.

Settlement Website

9. Kroll will work with Counsel to create a dedicated Settlement Website. The Settlement Website URL will be determined and approved by Counsel. The Settlement Website will contain a summary of the Settlement, will allow Settlement Class Members to contact the Settlement Administrator with any questions or changes of address, provide notice of important dates such as the Fairness Hearing, Claim Deadline, Objection Deadline, and Opt-Out Deadline, and provide Settlement Class Members who file Claim Forms online the opportunity to select an electronic payment method, including Venmo, Zelle, PayPal, ACH, or payment by check. The Settlement Website will also contain relevant case documents including Plaintiff's Complaint, the Settlement Agreement, the Long Form Notice, Plaintiff's Motion for Preliminary Approval, and the Preliminary Approval Order.

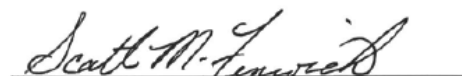
Toll-Free Number

10. Kroll will also establish a toll-free number for the Settlement. The toll-free number will allow Settlement Class Members to call and obtain information about the Settlement through an Interactive Voice Response System and/or by being connected to a live agent.

Administration Cost

11. Based on Kroll's current understanding of the class size and requested administration services, estimated fees and expenses for notice and administration are approximately \$169,521 for fees and costs for direct notice and claims administration under the Settlement. The current estimate is subject to change depending on factors such as the actual Settlement class size and/or any Settlement administration scope change not currently under consideration.

I declare under penalty of perjury under the laws of the United States that the above is true and correct to the best of my knowledge and that this declaration was executed on March 10, 2023, in Woodbury, Minnesota.



Scott M. Fenwick